

**STATE OF WASHINGTON
OFFICE OF THE INSURANCE COMMISSIONER**

In the Matter of

01 Dental Plan, LLC,

Respondent.

Order No. 15-0108

ORDER TO CEASE AND DESIST

Pursuant to RCW 48.02.080, RCW 48.15.020, RCW 48.15.023, RCW 48.155.020, and RCW 48.155.130 the Insurance Commissioner of the state of Washington ("Insurance Commissioner") orders the above-named Respondent, and its officers, directors, trustees, employees, agents, and affiliates to immediately cease and desist from:

- A. Engaging in or transacting the unauthorized business of insurance or acting as an unregistered service contract provider in the state of Washington;
- B. Seeking, pursuing and obtaining any insurance or service contract business in the state of Washington;
- C. Soliciting Washington residents to sell any insurance or health care discount plan issued or to be issued by an unauthorized insurer or unregistered service contract provider;
- D. Soliciting Washington residents to induce them to purchase any insurance contract or health care discount plan.

BASIS:

1. 01 Dental Plan, LLC ("01 Dental" or "the Company") was a licensed discount plan organization domiciled in Washington. Its license expired on June 30, 2014. Zahra Soltani ("Soltani") was the sole corporate member and manager responsible for all business functions and roles of 01 Dental.

2. The Company sold at least 100 memberships, with up to 5 people per membership. A review of the Company's filings and website revealed that the Company failed to timely file its annual report and renewal application, to provide a run-off plan, and to properly operate under its legal name.

3. In February 2014, the Insurance Commissioner notified 01 Dental that its annual report was due by the end of March 2014. Upon request for clarification, the Insurance Commissioner's Chief Financial Analyst spoke to 01 Dental's representative by phone and walked her through the annual report form. The Company subsequently failed to meet the annual report deadline and its renewal application deadline of April 1, 2014. The Insurance Commissioner extended the renewal application deadline to April 22, 2014. By this deadline, 01 Dental submitted both its renewal application and financial statements.

4. After the Insurance Commissioner received 01 Dental's filings, the Insurance Commissioner discovered that Soltani moved to California on an undisclosed date. The Insurance Commissioner also found that Soltani had not commenced business when planned, where planned, nor in adherence with the business plan filed with the Insurance Commissioner. Further, the Company failed to demonstrate that it remained viable for relicensing during the renewal period. A review of 01 Dental's website revealed that the Company did not operate under its legal name online.

5. In May 2014, the Insurance Commissioner provided options for 01 Dental to address the material issues with its renewal application. The Company did not report any substantive progress it made to rectify the issues.

6. On June 2, 2014, the Insurance Commissioner issued 01 Dental a Notice of Intent to Non-Renew its license, effective July 1, 2014.

7. On June 16, 2014, the Insurance Commissioner asked 01 Dental to confirm that it ceased all Washington activities and to provide the details of its plan to wind up its affairs by July 1, 2014. The Company did not respond, so the Insurance Commissioner sent a second request on July 7, 2014.

8. On July 10, 2014, counsel for 01 Dental stated: (1) the website would be amended to give notice that the plan is not available in Washington as of July 10, 2014; (2) 01 Dental would "develop a plan for the run-off and discuss it with you to ensure that it is acceptable"; and (3) "no new members will be signed up in the interim and not [sic] further

marketing will take place.” The Insurance Commissioner confirmed that the disclosure was added to the website. The other statements remain unconfirmed and the Company has failed to provide a run-off plan to date.

9. Respondent’s actions described herein violate the following Insurance Code provisions and rules RCW 48.155.020(9)(c), RCW 48.155.090(1)(c), RCW 48.155.100, RCW 48.155.110(1), RCW 48.155.110(3), RCW 48.155.130(1), WAC 284-155-015(3), WAC 284-155-015(4)(b), and WAC-284-155-030(4).

IT IS FURTHER ORDERED that nothing herein shall prevent Respondent from fulfilling the terms of contracts formed prior to the effective date of this Order pursuant to RCW 48.15.020(2)(b). Any violation of the terms of this Order by Respondent and their officers, directors, trustees, employees, agents, and affiliates or the Respondent’s failure to fulfill or perform its contracts subject to this Order will render the violator(s) subject to the full penalties authorized by RCW 48.02.080, 48.15.023, and other applicable sections of the Insurance Code of the state of Washington.

Respondent has the right to demand a hearing pursuant to RCW Chapters 48.04 and RCW 34.05. This Order shall remain in effect subject to the further order of the Insurance Commissioner.

THIS ORDER IS EFFECTIVE IMMEDIATELY AND IS ENTERED at Tumwater, Washington, this 16th day of April, 2015.



MIKE KREIDLER
Insurance Commissioner

By and through his designee



Drew Stillman
Insurance Enforcement Specialist
Legal Affairs Division

CERTIFICATE OF MAILING

The undersigned certifies under the penalty of perjury under the laws of the state of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the state of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On the date given below I caused to be served the foregoing ORDER TO CEASE AND DESIST on the following individual(s) by email and by depositing in the U.S. mail via state Consolidated Mail Service with proper postage affixed to:

01 Dental Plan, LLC
C/O Zahra Soltan
22106 SE 51st Place
Issaquah WA 98029

01 Dental Plan, LLC
C/O Zahra Soltani
4434 95th Ave NE
Yarrow Point WA 98004

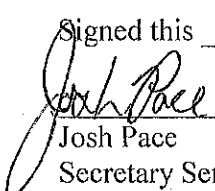
01 Dental Plan, LLC
Max Soi, Attorney
Justin Mishkin, Attorney
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Seattle WA 98104

01 Dental Plan, LLC
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01 Dental Plan, LLC
C/O Zahra Soltani
46 Echo Glen
Irvine CA 92603

zsoltani@hotmail.com

Signed this 16th day of April, 2015, at Tumwater, Washington.



Josh Pace
Secretary Senior
Legal Affairs Division